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By ECF
May 22, 2015

Honorable Frank Maas
U.S. District Court for the Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD)(FM)

Dear Judge Maas:

I write in response to the letter from the Plaintiffs' Executive Committee (ECF No. 2954) (May 15, 2015), regarding the assets of Al Haramain Islamic Foundation, Inc. ("AHIF-USA"). During the discovery status conference on May 13, 2015, in response to this Court's query, I had to estimate the amount in AHIF-USA's bank account, as our firm has not received an accounting of the blocked assets from the Office of Foreign Assets Control (OFAC), Department of the Treasury. I have now made an inquiry, and am able to provide a more precise determination.

Michael Schisa of OFAC has informed me that, according to the annual report submitted by Bank of America to OFAC, there was "approximately \$380,000 in blocked assets" as of June 30, 2014. However, this amount does not reflect the \$121,275 that AHIF-USA paid to the IRS in July 2014 to settle the tax assessment on the organization, so that the current balance in the bank account would be approximately \$258,725. We would be willing to request additional information from OFAC if this Court so desires.

Plaintiffs' letter also references the property located in Springfield, Missouri, which I did not think of when I was providing this Court with an estimate of the amount in the bank account. However, that property is currently occupied by an unrelated group, the Islamic Center of Springfield, which has claimed an ownership interest in the property. AHIF-USA was unable to pursue any resolution of that group's ownership claim after AHIF-USA ceased operations, so the value of that asset to AHIF-USA, if any, is uncertain.

Honorable Frank Maas

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Sincerely,

/s/ Alan R. Kabat

Alan R. Kabat

cc: Hon. George B. Daniels
MDL-1570 Counsel of Record